

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,  
Plaintiff,

v.

**JUAN R. MERCED MORALES**  
Defendant.

CRIM. NO. 97-0072

**URGENT REQUEST FOR EXTENSION OF TIME**

TO THE HONORABLE COURT:

COMES NOW, the United States of America, through the undersigned attorneys, and before this Honorable Court very respectfully states and prays as follows:

1. On January 25, 2008, the defendant file a "Motion for a Reduction of Sentence" (Dkt. No. 741).
2. The undersigned Assistant United States Attorney was out of the office in official travel, at the National Advocacy Center, from the 7<sup>th</sup> to the 18<sup>th</sup> of January, 2008. As such, it was not until the 22th of January, 2008, that the undersigned arrived to the office.
3. Unfortunately, when the instant case was closed our case file was sent to the Federal Record Center, Central Plains Region, Lee's Summit, Missouri. Therefore, the undersigned has not been able to become familiar with the facts and circumstances surrounding this case. Specifically, the undersigned does not know the terms of the Pre-Sentence Investigation Report, and other relevant documents.
4. The undersigned has requested the file in the case and will need additional time to prepare a response to defendant's motion for reduction of sentence. Therefore, the United States requests an extension of thirty days, until March 5, 2008, to file the responsive pleading.

WHEREFORE, the United States respectfully requests from the Court to take notice of the above, and to grant an extension of thirty days, until March 5, 2008, to file a response to defendant's motion for reduction of sentence.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 4th day of February, 2008.

ROSA EMILIA RODRÍGUEZ-VÉLEZ  
United States Attorney

s\Ilianys Rivera Miranda  
Ilianys Rivera Miranda - 223006  
Assistant U.S. Attorney  
Torre Chardón, Room 1201  
350 Carlos Chardón Avenue  
San Juan, PR 00918  
Tel. (787) 766-5656  
[Ilianys.Rivera@usdoj.gov](mailto:Ilianys.Rivera@usdoj.gov)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system to notify the counsels of record, and to defendant Juan R. Merced Morales, inmate # 14729-069 by priority mail at: F.C.C. Yazoo City (medium), P.O. Box 5888, Yazoo City, M.S. 39194-5888

At San Juan, Puerto Rico, this 4<sup>th</sup> day of February, 2008.

s\Ilianys Rivera Miranda  
Ilianys Rivera Miranda - 223006  
Assistant U.S. Attorney

---